

UNITED STATES DISTRICT COURT
for the

WESTERN

DISTRICT OF

OKLAHOMA

United States of America

v.

Glenn Allen Kirkham

Case No: M-13- 16 -RO

FILED

JAN 15 2013

ROBERT D. DENNIS, CLERK
U.S. DIST. COURT, WESTERN DIST. OF OKLA.
BY SK DEPUTY

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 14, 2013, in the county of Oklahoma County, in the Western District of Oklahoma, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 875(c)

Transmitting a threat to injure a person in interstate or foreign commerce

This criminal complaint is based on these facts:

See attached Affidavit of Douglas Samuels, Special Agent , Federal Bureau of Investigation, which is incorporated and made a part hereof by reference.

☐ Continued on the attached sheet.

Douglas Samuels
Complainant's signature

Douglas Samuels
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence.

Date: January 15, 2013

City and State: Oklahoma City, Oklahoma

Bana Roberts
Judge's signature

Bana Roberts, U.S. Magistrate Judge
Printed name and title

WESTERN DISTRICT OF OKLAHOMA
OKLAHOMA CITY, OKLAHOMA

STATE OF OKLAHOMA)
)
COUNTY OF OKLAHOMA)

AFFIDAVIT

I, DOUGLAS SAMUELS, being duly sworn, do hereby state as follows:

I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed for the past twenty years. I am currently assigned to the Oklahoma City field office.

As a special agent, I am a law enforcement officer of the United States as defined by Title 18, United States Code, Section 2510(7), meaning I am empowered by law to conduct investigations of and to make arrests for violations of Federal Law. Furthermore, my employment with the FBI vests me with the authority to investigate violations of Federal Laws, including Title 18, United States Code, Section 875(c), transmitting interstate threats. During my employment as a special agent, I have participated in investigations as the primary investigator or in a backup capacity. I have personally participated in this investigation and am familiar with the information contained in this Affidavit either through personal investigation or discussions with other law enforcement personnel.

FURTHER YOUR AFFIANT STATES AS FOLLOWS:

This Affidavit is submitted in support of a Complaint charging GLENN ALLEN KIRKHAM, a white male with a date of birth of xx-xx-1978, social security number of xxx-xx-3139, with a violation of Title 18, United States Code, Section 875(c). I submit that

probable cause exists to believe that KIRKHAM transmitted an interstate threat on January 14, 2013.

On Monday, January 14, 2013, at approximately 7:00 am MST, the Casper Police Department (CPD), Casper, Wyoming, started receiving numerous calls concerning a possible threat directed against Casper, Wyoming. The first call originated from James Derkson, British Columbia, Canada, and other calls came from various other locations including Virginia, Arizona, Washington, Pennsylvania, and Maryland. These callers notified the CPD police dispatch center (911 system) about the below described internet posting which was located on 4chan.org, an internet-based bulletin board where anyone in the world with internet access can post comments and share images with other internet users.

At approximately 7:30 am MST, Federal Bureau of Investigation (FBI) Special Agent James Patrick, Casper Resident Agency/Denver Division, was notified of this potential threat by Chris Walsh, Chief of Police, CPD, Casper, Wyoming.

Upon arriving at the CPD, SA Patrick was provided the following post on 4chan. According to CPD computer experts, the writer is listed as Anonymous (ID: HX3/D3du; 01/14/13; Mon, 08:37:51; No: 450966251) using an IP address of 108.222.166.65.

Watch the news in about 1-2 two hours. Casper, Wyoming.

I'll be using a .357 magnum revolver, a .22 derringer, several kitchen knives, an aluminum baseball bat, a hammer, and a wood stake made out of hickory. And if the opportunity arises, I may even use my truck.

Lifelong lover of firearms, including exotic Class 3 full auto and things of that nature. I've got all kinds of AR's and guns that could mow down a small village before police arrive. But to use those would further the case that many are making

now, that those types of weapons should be illegal and/or taken from us. So I'm using my life to prove a point for you all, to show everyone that a very high score can be racked up using rather primitive weapons and even household objects. I'd like to see them ban all of the above. Those fucking cunts want a war on guns, and I'm about to end that war today. I will be victorious. I will make it clear that intricate planning and poor weapons will trump amateurs with AK's any day of the week. I'm tired of history being written incorrectly, and then never being corrected, and those who know the truth being dismissed, having their characters assassinated in public, or even killed. That kid in CT used handguns, that's it. But everyone reported that he used shotguns and/or an AR. I won't even go into all the theories about "parents" being actors and such.

That's it, I will not be posting anymore. I cannot risk giving away my identity or location, just be patient and there will be no doubt that the person you see on the news was that guy on 4chan.

I give my life for your freedom today. I love you, /b/rothers.

I will be leaving a letter that will be found, and I will blame my act on ninegag and reddit. I ask that you all do nothing to contradict that.

It should be noted that just over six weeks ago, on November 30, 2012, an incident occurred in Casper, Wyoming, that was widely reported by national news organizations as a double homicide and suicide at a local college. The subject used a bow and arrow to kill one of his victims and a large Bowie knife on both victims and himself.

Based on the above and the aforementioned Internet post, local law enforcement authorities immediately started up and implemented a Command Post with the FBI resident agents, CPD detectives and patrol officers, and Natrona County Sheriff's Office deputies

responding to mitigate and investigate this threat. The CPD called in three additional off-duty officers to help with the protection of possible targets of this threat.

At this same time, all Natrona County schools (elementary, secondary, and high schools) were placed on lock-down status. This affected about 40 Natrona County schools and an estimated 11,500 students. This lockdown status effectively prevented the teachers and students from participating in scheduled events and/or their ability to go outside. Parents were notified of the Natrona County School District lockdown via an automated message with several parents opting to remove their children from school out of an abundance of caution.

At approximately 9:40 am MST, Natrona County Emergency Management officials activated the county's Code RED community notification system which is an automated system using phone calls, text messages and emails. This system is an automated reverse 911 callback system, which attempted to alert about 51,092 Natrona County residents, with 29,347 actively notified. Businesses, malls, and the courthouses were also notified of this threat by the CPD.

Approximately two hours and twelve minutes later, the writer of the original post apparently responded to the Internet thread on 4chan regarding his original post. The writer posted the following:

nobody will believe me, and this post may not even get read, but I don't care. I've had my fun and now I must leave. I am the original OP of the original thread, and I'm also the mastermind behind the Jimmy Russells trolling. Pretty much any master troll threads you see here on /b/, 90% of them are me.

I don't have the same post ID because my router reset about an hour ago. If I knew a way to prove who I am, I would, just to let you all off the hook with certainty. But yeah, my single post resulted in 4+ threads of troll victims, a

preemptive RIP facebook page, threads on other forums, numerous calls to authorities, etc ... But I'm still here and I'm not V& ... for a few different reasons. I never mentioned what I was going to do with these weapons. I never said anything about a school or killing people, you all let your imaginations and assumptions run wild, and it fed your own morbid fascination with violence sprees. I live about 18 hours away from Wyoming, so even if I did get backtraced and V&, they would know that I had no way to carry out any threats that far away in 1-2 hours. Also, regarding threats, I made none. I may have planning to use all those weapons on an innocent tree on my ranch, which would be perfectly legal. I might earn one point for each mark of damage I made to that tree, and beat the high score. I made no real actionable threats. I live obviously too far away to have made good on any threats, had they made, and let's not forget that everything posted here is a work of fiction, and only a fool would take anything posted here as fact.

Have a nice day, thanks for filling my past 2+ hours with all kinds of lulz, hue hues, chuckles, and giggles.

(Anonymous; ID: VSbyUw5H; 01/14/13; Mon; 10:49:14; No: 450980448)

The Internet Protocol (IP) address for the above postings (108.222.166.65) was determined to originate from AT&T, Oklahoma City, OK. CPD Detective Jeremy Tiller requested an Emergency Request for Customer Communications Records from AT&T, to determine the identity/address of the IP account holder.

The response from Rhonda Compton, Manager, Internet Legal Compliance, AT&T Internet Services, dated 01/14/2013, to Detective Tiller's request provided the following regarding the assigned IP address (108.222.166.65):

Customer Name: GLENN KIRKHAM

Account Number: xxxx0475

Member ID: babachoo

Domain: att.net

WTN: xxx-xxx-5557

Account Status: Active

Service Address: 2705 W I-240 Service Rd, Apt C, Oklahoma City, OK, 73159

Billing Address: 11501 Lochwood Dr, Apt 612, Oklahoma City, OK, 73099

Username: babachoo@att.net

This information was immediately relayed to the Oklahoma City FBI so they could conduct an investigation and interview KIRKHAM. The above information was received by the Oklahoma City Division of the FBI. Due to the violent nature of the threat and the reference of KIRKHAM possessing firearms, background checks on KIRKHAM were performed. It was determined that KIRKHAM does possess an Oklahoma license to carry a concealed firearm.

At approximately 2:50 pm CST, KIRKHAM was contacted by your affiant at the Pickwick Apartments, 2705 W. I-240 Service Road, Apartment C, Oklahoma City, Oklahoma. KIRKHAM was asked if he knew the reason the FBI was at his apartment. KIRKHAM responded by saying it was due to the posting he had made earlier in the day on the internet bulletin board 4chan. The FBI advised he was correct. KIRKHAM said he posted the statement on www.4chan.org between 7:00 to 7:15 am CST on January 14, 2013, from a computer maintained in the apartment. He said he "posted a vague

falsehood" and "posted a work of artistic falsehood." KIRKHAM said he posted a second time at approximately 10:49 am CST from a computer maintained in the apartment on January 14, 2013, which was also an "artistic falsehood."

KIRKHAM was asked why he made the postings. He said he picked Casper, Wyoming at random and that he wrote with no direct threat and was baiting people with something to let their minds run wild. KIRKHAM added that every page of 4chan says something to the effect that, all post on the website are works of artistic falsehoods and anyone would be a fool to believe any posting.

Based on the above-mentioned facts, I submit there is probable cause to charge GLENN ALLEN KIRKHAM with a violation of Title 18, United States Code, Section 875(c), for transmitting an interstate threat on January 14, 2013.

FURTHER, YOUR AFFIANT SAYETH NOT.



Douglas Samuels

Special Agent

Federal Bureau of Investigation

Sworn to and subscribed before me on this 15th day of January, 2013.



BANA ROBERTS

UNITED STATES MAGISTRATE JUDGE